

EXHIBIT C

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Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO TRUCKING)
INC.)
Defendants)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF RHIAN MORGAN

San Francisco, California

Friday, August 18, 2017

Reported by:

JOANNE M. FARRELL, RPR, CRR

CSR Nos. 4838(CA) 506(HI) 507(NM)

Job No. 2681035

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1 A. Yes.

12:47:47PM

2 Q. And I believe you said that the majority of
3 the employees had laptops; some may have had
4 desktops.

5 Do you recall that?

12:47:56PM

6 A. Yes.

7 Q. Were these company-issued computers?

8 A. Yes.

9 Q. Did anybody use a personal computer at that
10 time for their work?

12:48:08PM

11 A. Not as far as I know.

12 There is one exception there. That would
13 be mine, until I got a work computer. So I should
14 clarify that.

15 Q. Roughly, when was that?

12:48:29PM

16 A. I used my personal computer for probably
17 the first three weeks? two weeks? Until we
18 purchased computers and began hiring people and
19 issuing company laptops.

20 Q. During this time period, January,

12:48:52PM

21 February 2016, did the company issue anybody any
22 cell phones?

23 A. I don't recall.

24 Q. Did the company ever issue anybody any cell
25 phones?

12:49:09PM

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1 A. We have purchased phones for people before. 12:49:12PM

2 Q. Who have you purchased phones for?

3 A. I remember Sameer Kshirsagar,

4 K-S-H-I-R-S-A-G-A-R. He requested -- he requested

5 that we purchase him a cell phone so that he could

12:49:39PM

6 keep his work and personal separate.

7 Q. So did -- to the best of your knowledge,

8 did everybody else just have one device for work and

9 personal?

10 MS. DEARBORN: Objection to form.

12:50:02PM

11 MR. BOOCK: Join.

12 THE WITNESS: Yeah, as far as I remember.

13 As far as I recall.

14 BY MS. EPSTEIN:

15 Q. Were those personally purchased devices?

12:50:09PM

16 MS. DEARBORN: Object as to form.

17 MR. BOOCK: Join.

18 THE WITNESS: Yes.

19 BY MS. EPSTEIN:

20 Q. Did Otto ever pay for anybody's cell phone

12:50:19PM

21 subscriptions, plans, or data? Strike that.

22 Did Otto ever pay for anybody's cell phone

23 subscriptions?

24 MS. DEARBORN: Object as to form.

25 MR. BOOCK: Join.

12:50:35PM

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1 THE WITNESS: Yes. I believe so. I was 12:50:38PM
2 not responsible for setting those accounts up, but I
3 have knowledge of people having their phones paid
4 for.

5 BY MS. EPSTEIN: 12:50:54PM

6 Q. Okay. Who do you know that had their
7 phones paid for?

8 A. With that phone that we bought for Sameer,
9 we put him on a plan also. Daniel Gruber used to
10 submit an expense for a part of his cell phone that 12:51:11PM
11 he had had signed off for the expense through his
12 manager. Those are the two cases that I directly
13 recall.

14 Q. Do you recall who was responsible for
15 setting those up? 12:51:34PM

16 A. Mason Feldman.

17 Q. Apart from you during the two- or
18 three-week period we were discussing, were you aware
19 of anybody else at Otto using their personal
20 computer for work purposes?

21 A. No, not that I know of.

22 MS. EPSTEIN: Could I have tab 11?

23 BY MS. EPSTEIN:

24 Q.

12:52:27PM

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings review of
15 the transcript { } was {x} was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: August 19, 2017

22
23 Joanne M. Farrell

24
25 Joanne M. Farrell, CSR No. 4838